



August 23, 2019

FCC Proceeding: 06-122

COMMENT

The New Hampshire Society for Technology in Education (NHSTE) is an independent professional association serving over 1,256 New Hampshire instructional technology professionals, classroom teachers, and network administrators. We work together to integrate the impact of our educational communities, provide leadership and professional learning opportunities for our members, and advocate on behalf of educators.

We are an autonomous organization and supported by ISTE's purposes and priorities. We are aligned with the ISTE (International Society of Technology in Education) Standards as a framework for students, educators, administrators, coaches and computer science educators, promoting the opportunity to rethink education and create innovative learning environments. The standards are helping educators and education leaders worldwide re-engineer schools and classrooms for digital age learning, no matter where they are on the journey to effective edtech integration.

Annually, we host a conference that is co-sponsored by the New Hampshire Administrators Association (NHSA), New Hampshire School Library Media Association (NHSLMA), and CoSN New Hampshire CTO Council where we share the newest changes and best practices in education technology with the collective members of these organizations, who then return to their home schools as teacher-leaders, library-media specialists, technology directors and professional development liaisons. Our network of professionals are leading the state in effective technology integration in all schools and districts – rural and urban - as well as having a presence K-12 through higher education. As our membership grows, the impact NHSTE has is invaluable as an affiliate advocacy organization, and is a leader of unifying educators in our state with the rest of the nation.

As a nation, 4.7 million more students have high-speed Internet access than they did in 2013. New Hampshire has done its part and connected 95% of its students within the state having connections capable of delivering 460kbps. As of August 2018, we currently have 13,143 students that still need scalable bandwidth for digital learning. That number represents 36 schools of which 67% are in rural school districts and 33% are in urban school districts. (Resource: Education Superhighway – State of the States <https://stateofthestates.educationsuperhighway.org/#state>) Financially, the cost of broadband in New Hampshire has decreased by 53% since 2015 compared to a 72% decrease nationally. Most importantly, schools in New Hampshire have utilized \$5.4 million in federal E-RATE Wi-Fi funding, connecting 363 schools with fiber. To fully experience the benefits of digital learning, students need access to sufficient bandwidth, scalable broadband infrastructure, and robust Wi-Fi.

NHSTE opposes the proposed Federal Communications Commission rulemaking that would cap funding for the federal Universal Service Fund as well as combine the E-Rate and Rural Health Care programs under a single funding cap.



Both of these proposals have the potential to reduce E-Rate funding, which is used to support the high-speed broadband and telecommunications necessary for digital learning in K-12 schools and public libraries. Over the course of the program's history, it has provided nearly \$50 billion to schools and libraries and helped connect all public school classrooms to the Internet.

In New Hampshire, E-Rate funds have made it possible to develop network infrastructure, perform network maintenance and expand Internet services and access in our schools. The equitable digital access supported by E-Rate is vital to providing innovative learning opportunities that prepare students for the future.

NHSTE has specific concerns with both of the proposals, which we describe in more detail below.

Instituting an Overall Funding Cap for the Universal Service Fund

NHSTE opposes the proposal to cap funding for the Universal Service Fund. Many of the programs funded by the Universal Service Fund already have their own programmatic caps.

All four universal service programs serve important goals and populations – schools/libraries, rural communities and low-income consumers. Instituting an overall spending cap on the Universal Service Fund at a time when increasing access to high-speed broadband is a top priority for many schools, local governments and states will undoubtedly lead to years when the FCC will need to weigh reductions in one program against reductions in another. There is no fair way to prioritize funding among these programs and the groups that they serve in the event that an overall universal service cap is exceeded by demand.

Instituting an overall Universal Service Fund cap would also create great uncertainty and potentially suppress participation because universal service program beneficiaries will not know in advance when an overall cap will be reached and funds prioritized. Further, because of this uncertainty, schools and libraries that operate on annual budgets will be unable to effectively plan broadband/Wi-Fi projects and/or reserve the undiscounted portions of their E-Rate eligible services.

This is contrary to the FCC's stated goals outlined in the notice of rulemaking of "ensuring adequate funding" and "providing predictability" for Universal Service Fund programs and their participants.

Instituting a Sub-cap That Combines E-Rate and the Rural Health Care Programs

NHSTE opposes the proposal to combine the E-Rate and Rural Health Care programs under a combined sub-cap.

The E-Rate program already operates under a spending cap and has been incredibly effective at achieving its goal of increasing connectivity for students. The number of students with strong broadband connectivity in their classrooms increased from 4 million to 45 million between 2013 and today because of E-Rate. In addition, CoSN's 2018-2019 Annual Infrastructure Report found that 92% of districts are meeting the FCC short-term goal of 100 Mbps per 1,000 students for all their schools.



Demand for the Rural Health Care program is already nearly exceeding its funding cap. If the Rural Health Care and E-Rate programs are combined under a single sub-cap, the Rural Health Care program will almost immediately begin consuming unused E-Rate funds. This could lead to a permanent shift of E-Rate funds away from schools and libraries and to Rural Health Care beneficiaries, making it difficult for the E-Rate program to respond to future demand.

Furthermore, if E-Rate's funding cap is reduced, it will constrain E-Rate funding and make it much harder to institute important changes to the E-Rate program, including adding to the Category 2 formula (if deemed necessary) and adding new services (such as cyber security software).

While E-Rate has been incredibly successful at connecting schools and libraries to high-speed broadband, there are still large numbers of students who don't have access to broadband at home. The E-Rate program helps bridge this connectivity gap by supporting the provision of high-speed broadband at K-12 schools and public libraries.

In addition, schools have a wide variety of needs when it comes to broadband capacity. Many schools now need—or will soon need—increased bandwidth due to the implementation of student 1:1 devices, online assessments and the growing use of broadband to support learning objectives in the classroom. New Hampshire schools have leveraged their broadband networks to support personalized learning, provide instruction on coding and to develop research skills through projects that are supported by engaging video streaming services such as Discovery Education, Safari Montage, and others.

The network upgrades that are needed to support robust educational technology programs that prepare students for 21st Century Careers require significant financial resources. According to CoSN, 50% of those surveyed said that the cost of ongoing, recurring expenses is the top barrier to increasing school district connectivity. Restricting the potential pool of E-Rate funding, which provides critical financial assistance to schools, will only make it harder for districts to meet the FCC's long-term broadband goals and to respond to changing educational technology needs.

Conclusion

Given the significant broadband connectivity gap that still exists in New Hampshire and the growing need to integrate educational technology into the classroom, NHSTE strongly opposes any proposals to cap funding for the Universal Service Fund or to combine the E-Rate and Rural Health Care programs under a single sub-cap. Instead, we request that the FCC explore ways to expand the number of services the E-Rate program can fund.

Thank you for your time and consideration.

Respectfully on behalf of our members,

Stanley Freeda, NHSTE President

Kathleen McClaskey, NHSTE Advocacy Chair